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FILED

CLERK, U.S. DISTRICT COURT

3/07/2025

CENTRAL DISTRICT OF CALIFORNIA
BY: ASI DEPUTY

## UNITED STATES DISTRICT COURT

## FOR THE CENTRAL DISTRICT OF CALIFORNIA

January 2025 Grand Jury

CR No. 5:25-cr-00068-MWF

## $\underline{\mathsf{I}} \ \underline{\mathsf{N}} \ \underline{\mathsf{D}} \ \underline{\mathsf{I}} \ \underline{\mathsf{C}} \ \underline{\mathsf{T}} \ \underline{\mathsf{M}} \ \underline{\mathsf{E}} \ \underline{\mathsf{N}} \ \underline{\mathsf{T}}$

[18 U.S.C. §§ 2113(a), (d): Armed
Bank Robbery; 18 U.S.C.
§§ 981(a)(1)(C), 28 U.S.C.
§ 2461(c): Criminal Forfeiture]

The Grand Jury charges:

UNITED STATES OF AMERICA,

v.

ARESH NARMAKI,

Plaintiff,

Defendant.

COUNT ONE

[18 U.S.C.  $\S$ § 2113(a), (d)]

On or about December 6, 2023, in Riverside County, within the Central District of California, defendant ARESH NARMAKI, by force and violence, and by intimidation, knowingly took from the person and presence of another approximately \$15,000 belonging to, and in the care, custody, control, management, and possession of Bank of America, located at 14284 Schleisman Road, Eastvale, California, a bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation.

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In committing said offense, defendant NARMAKI knowingly assaulted and put in jeopardy the life of victim teller S.V., and others, by using a dangerous weapon and device, namely, an item that appeared to be a handgun.

COUNT TWO

[18 U.S.C.  $\S$ § 2113(a), (d)]

On or about January 4, 2024, in San Bernardino County, within the Central District of California, defendant ARESH NARMAKI, by force and violence, and by intimidation, knowingly took from the person and presence of another approximately \$5,600 belonging to, and in the care, custody, control, management, and possession of Wells Fargo Bank, located at 15860 Soquel Canyon Parkway, Chino Hills, California, a bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation.

In committing said offense, defendant NARMAKI knowingly assaulted and put in jeopardy the life of victim teller A.Y., and others, by using a dangerous weapon and device, namely, an item that appeared to be a handgun and an item that appeared to be an explosive device.

FORFEITURE ALLEGATION

[18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c)]

1. Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 18,

United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), in the event of any defendant's conviction of

any offense set forth in this Indictment.

- 2. Any defendant so convicted shall forfeit to the United States of America the following:
- (a) All right, title, and interest in any and all property, real or personal, constituting, or derived from, any proceeds traceable to the offense; and
- (b) To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraph (a).
- 3. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), any convicted defendant shall forfeit substitute property, up to the value of the property described in the preceding paragraph if, as the result of any act or omission of said defendant, the property described in the preceding paragraph or any portion thereof (a) cannot be located upon the exercise of due diligence; (b) has been transferred, sold to, or deposited with a third party; (c) has been placed beyond the jurisdiction of the court; (d) has been

27 //

substantially diminished in value; or (e) has been commingled with 1 2 other property that cannot be divided without difficulty. 3 4 A TRUE BILL 5 6 /S/ Foreperson 7 8 JOSEPH T. MCNALLY Acting United States Attorney 9 LINDSEY GREER DOTSON 10 Assistant United States Attorney Chief, Criminal Division 11 12 13 FRANCES S. LEWIS Assistant United States Attorney 14 Chief, General Crimes Section 15 SHAWN T. ANDREWS Assistant United States Attorney 16 Deputy Chief, General Crimes Section 17 BRANDON E. MARTINEZ-JONES 18 Assistant United States Attorney Violent and Organized Crime 19 Section 20 21 22 23 24 25 26 27

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